

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 93046 / September 17, 2021

ADMINISTRATIVE PROCEEDING
File No. 3-19480

In the Matter of

RONALD P. HALLER,

Respondent.

**ORDER MAKING FINDINGS AND
IMPOSING REMEDIAL SANCTIONS
PURSUANT TO SECTION 17A(c)(4)(C)
OF THE SECURITIES EXCHANGE ACT
OF 1934**

I.

On September 20, 2019, the Securities and Exchange Commission (“Commission”) instituted public administrative proceedings pursuant to Section 17A(c)(4)(C) of the Securities Exchange Act of 1934 (“Exchange Act”) against Ronald P. Haller (“Haller” or “Respondent”).

II.

After institution of these proceedings, Respondent submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, Respondent admits the Commission’s jurisdiction over him and the subject matter of these proceedings and the findings contained in paragraph III.2 below and consents to the entry of this Order Making Findings and Imposing Remedial Relief Pursuant to Section 17A(c)(4)(C) of the Securities Exchange Act of 1934 (“Order”), as set forth below.

III.

On the basis of this Order and Respondent's Offer, the Commission finds that

1. Haller, 67 years old and a resident of Orilla, Ontario, Canada was the Treasurer of Heritage Transfer Agency ("Heritage Transfer") from at least November 2004 through December 2012, and an associated person of Heritage U.S. Transfer Corp. ("Heritage US") from May 2012 through December 2015. Heritage US is a transfer agent registered with the Commission. Heritage Transfer is a transfer agent that was registered with the Commission until December 2012.

2. On May 23, 2017, Haller pled guilty in the Ontario Court of Justice to one count of defrauding a brokerage firm at which he was an account holder of more than \$5,000, in violation of Section 380(1)(a) of the Criminal Code of Canada. He was criminally convicted by a foreign court of competent jurisdiction. On November 27, 2017, Haller was given a conditional sentence of 6 months at home, 12 months' probation, and a 10-year ban from performing any work or service that involves having authority over real property, money or a valuable security of another person.

3. In connection with that plea, Haller admitted that:

- (a) Commencing in 2012, he misappropriated and sold seven stock certificates from clients of a transfer agent;
- (b) He issued stock certificates in his own name or changed to his name certificates that previously were issued to others;
- (c) He deposited the stock certificates into his personal brokerage account;
- (d) He sold the misappropriated shares until at least February 2015, for a total profit of \$122,275.40; and
- (e) He manipulated the transfer agent's records in an attempt to hide his fraudulent transactions.

During the time of this conduct, Haller was an associated person of registered transfer agents Heritage US and Heritage Transfer.

IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent's Offer.

Accordingly, it is hereby ORDERED pursuant to Section 17A(c)(4)(C) of the Exchange Act, that Respondent Haller be, and hereby is, barred from association with any transfer agent, broker, dealer, investment adviser, municipal securities dealer, municipal advisor, or nationally recognized statistical rating organization.

Any reapplication for association by the Respondent will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, compliance with the Commission's Order and payment of any or all of the following: (a) any disgorgement or civil penalties ordered by a Court against the Respondent in any action brought by the Commission; (b) any disgorgement amounts ordered against the Respondent for which the Commission waived payment; (c) any arbitration award related to the conduct that served as the basis for the Commission's Order; (d) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission's Order; and (e) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission's Order.

By the Commission.

Vanessa A. Countryman
Secretary